

RIBLET PRODUCTS CORPORATION

June 16, 1989

Ms. Susan Swales, 5HSM-12
Superfund Program Management Branch
U.S. Environmental Protection Agency, 5HS-11
230 South Dearborn Street
Chicago, Illinois 60604

Re: Response of Riblet Products Corporation to Request for
Information concerning Himco Inc. site in Elkhart County,
Indiana

Dear Ms. Swales:

This letter constitutes the response of Riblet Products Corporation ("Riblet" or "the Company") to the Request for Information dated April 20, 1989, sent by Mr. Norm Neidergang, Chief of the Remedial and Enforcement Response Branch. Riblet has been granted an extension of time by the Office of Regional Counsel to respond to the Request for Information. Initially, I would like to note that the Company fully and completely responded to the Information Request previously sent in November of 1988. In Mr. Neidergang's April 20 1989 letter, he states that the Company's "responses are inadequate." No explanation is given for this conclusion, and the Company is unable to find a basis for this statement. Since all, or nearly all, recipients of the November 10, 1988, Information Request have received the identical April 20 Information Request, the conclusion that all companies' responses were inadequate is questionable.

In addition, the Company wishes to note its objection to the instructions and requests for information to the extent that the information sought is attorney work product, is subject to the attorney-client privilege, calls for answers on matter of law or the application of law to facts, is not available to or within the Company's control, or is beyond the grant of authority to the United States Environmental Protection Agency pursuant to the statutes cited in the information request. Subject to these general objections, and without waiving them, the Company responds to the Request for Information as follows:

Request 1. Identify all persons consulted in the preparation of the answers to these Information Requests.

Response 1. Don Smith, Brian Elias, Gary Hoipkemier and Dan Wilson. Each individual named may be reached at Riblet Products Corporation, P. O. Box 1124, Elkhart, Indiana 46516. The telephone number of the corporation is 219-522-0995.

Request 2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests and provide copies of all such documents.

Response 2. There are no responsive documents in the Company's possession.

Request 3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request, or who may be able to provide additional responsive documents, identify such persons.

Response 3. The Company does not know of any such person.

Request 4. Describe the types of Company operations and/or processes performed between January 1960 and December 1977.

Response 4. During the relevant period of time, the Company manufactured mobile home chassis and galvanized mobile home roofing. Processes consisted of steel fabrication of I-beam into chassis for the mobile home industry. The galvanized roofing line consisted of slitting and forming material to size and rolling up roofing, followed by shipping the material to customers.

To the best of the Company's knowledge, no hazardous waste was generated by the Company prior to 1988. To the best of the Company's knowledge, none was generated during the relevant period of time.

Mobile home frames have been dipped and coated with asphalt material since 1971. No waste has been generated from this operation. Prior to 1971, the frames were sprayed with asphalt coating in a paint shed; the waste generated constituted dry sand and overspray. This waste material was not given to a waste transporter for disposal off-site.

Request 5. Identify ingredients, raw materials or products used in Company operations or processes between January 1960 and December 1977.

Response 5. Steel I-beam, galvanized steel and hot rolled steel, asphalt coating mineral spirits, and welding rods.

Request 6. Identify the wastes generated from Company operations or processes other than those identified in Request 5.

Response 6. Request 6 is ambiguous. The Company's waste streams during the relevant period of time have previously been identified and discussed in the December 30, 1988 response. That answer is incorporated herein by reference. By its terms, Request 6 refers to Request 5. Request 5 does not deal with wastes. There are no other operations or processes other than those described in the answer to Request 5. Nonetheless, in an effort to be cooperative and responsive to U. S. EPA's general request, the Company states that its waste materials during the relevant period of time consisted of the following: scrap steel and galvanized banding material, wooden skids, cardboard, burlap bags, floor sweepings, discarded uniforms, paper coveralls, and office wastepaper.

Request 7. Identify all haulers of waste from your facility between January 1960 and December 1977.

Response 7. Himco Waste-Away Service Inc.

Request 8. Provide all information and documents related to disposition of the wastes picked up from your facility.

Response 8. The Company understands this Request to apply only to the period January 1960 through December 1977. See response to Request 2 above.

Request 9. Did you dispose of any wastes on your property between January 1960 and December 1977.

Response 9. The Company objects to Request 9 since it seeks information unrelated to the Site that is the subject of the Information Request. Nonetheless, in an effort to be responsive, the Company states that at some unknown point during this period of time, various materials were disposed on Company property. It is the Company's understanding that all such materials were inert.

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TECHNICAL SUPPORT
SECTION

The undersigned, Charles L. Gruner, Executive Vice President of Riblet Products Corporation, has prepared these answers and hereby certifies that the responses are, to the best of his knowledge and belief, true and authentic. The responses have been prepared following a diligent search of available records and good faith efforts to interview those who may have knowledge of the operations, hazardous substance use, storage, treatment, disposal or other handling practice of the Company between 1960 and December 1977.

Dated: June 16, 1989

RIBLET PRODUCTS CORPORATION

By Charles L. Gruner
Charles L. Gruner

Its Chief Operating Officer

STATE OF INDIANA)
) SS:
COUNTY OF ELKHART)

Before me the undersigned, a Notary Public for Elkhart County, State of Indiana, personally appeared Charles L. Gruner and acknowledged the execution of the foregoing instrument this 16th day of June, 1989.

Patricia L. Charvat
Patricia L. Charvat
Notary Public, Elkhart County,
Indiana

My commission expires: 4-6-92

Copy to: Dan Wilson
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